

# **EXHIBIT A**

**Siu, Sarah E.**

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**From:** Angelo Pavone <apavone@sheppardmullin.com>  
**Sent:** Friday, September 1, 2023 11:15 PM  
**To:** Siu, Sarah E.; Stein, Callan G.; Lacy, Michael E.; Flynn, Virginia Bell; Liberman, Harry J.  
**Cc:** Paul Werner; Dave Thomas; Imad Matini; Amanda Witt; Charles Spencer-Davis; Calla Simeone; Kathryn J. Ryan; Tom Reklaitis; Alexandra Bustamante; Maria-Laura Coltre; Hannah Wigger  
**Subject:** Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.  
**Attachments:** Notice of Deposition - G. Boudreaux.pdf

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Counsel,

Please find attached AIS's deposition notice to Gail Boudreaux. Please let us know available dates as soon as possible.

Best regards,

**Angelo Pavone** | Associate  
+1 202-747-2332 | direct  
[apavone@sheppardmullin.com](mailto:apavone@sheppardmullin.com)

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

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**BOND PHARMACY, INC., d/b/a AIS  
HEALTHCARE,**

**Plaintiff-Counter Defendant,**

**v.**

**ANTHEM HEALTH PLANS OF  
VIRGINIA, INC., d/b/a ANTHEM  
BLUE CROSS AND BLUE SHIELD,**

**Defendant-Counterclaimant.**

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**Case No. 1:22-cv-01343-CMH-IDD**

**NOTICE OF DEPOSITION OF GAIL K. BOUDREAUX**

TO: Gail K. Boudreaux  
c/o Michael E. Lacy  
TROUTMAN PEPPER HAMILTON SANDERS LLP  
P.O. Box 1122  
Richmond, Virginia 23218-1122  
Telephone: (804) 697-1326  
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*Attorneys for Respondent*

PLEASE TAKE NOTICE that on a date and time to be agreed upon by the parties, Plaintiff Bond Pharmacy, Inc., d/b/a AIS Healthcare (“AIS”), will proceed to take the oral deposition of Gail Boudreaux, to be used for all proper purposes allowed under the Federal Rules of Civil Procedure, the local rules of this Court, any Orders entered in this matter, and the agreed stipulations of the parties.

This deposition will be conducted remotely using videoconference technology. The dial-in information for the deposition will be sent under separate cover. The deposition will be taken before a court reporter who is authorized to administer oaths and will continue from day to day

until completed. The deponent, court reporter, and counsel for the parties will each participate in the videoconference deposition remotely and separately. This deposition may be used at trial or hearing to the same extent that an in-person deposition may be used in such proceeding. The parties will not object on the basis that the deposition is being taken remotely, or that the court reporter is not physically present with the witness whose deposition is being taken. Counsel shall not initiate any private communications, including through text messages, electronic mail, or chat features, with the deponent while a question is pending.

The deposition may also be recorded in real time and by video. AIS reserves the right to use any video-recording at the parties' final hearing or any other proceeding.

Dated: September 1, 2023

By:   
Paul A. Werner  
Imad Matini  
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*Attorneys for Plaintiff Counter-Defendant Bond Pharmacy  
d/b/a AIS Healthcare*